

Date Mailed
November 20, 1998

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation of Area Code Relief
Issues and Options for the 414 Area Code

05-TI-181

**NOTICE OF PROCEEDING,
PUBLIC HEARINGS,
AND REQUEST FOR COMMENTS**

Dates, times, and locations for public hearings are found in the table on page 5.

Comments due:

December 30, 1998 **by noon**

Fax comments due:

December 29, 1998 **by noon**

Address Comments To:

Lynda L. Dorr
Secretary to the Commission
Public Service Commission of Wisconsin
610 N. Whitney Way (53705)
P.O. Box 7854
Madison, WI 53707-7854
FAX: 608/266-3957

This proceeding is opened to address the introduction of another area code in that portion of eastern Wisconsin now served by the 414 area code. It is estimated that available telephone numbers in the 414 area code will exhaust in early 1999.¹ To ensure that telephone numbers remain available in this area, action must be taken to introduce another area code in this area.

The need for yet another new area code in the 414 area is prompted by the growth of telecommunications competition as well as by demands for new telecommunications services and telephone numbers. The increasing appearance of new service providers² and the growing use by the public of wireless telephones, pagers, facsimile machines, and modems have consumed additional telephone numbers.³ In 1996, the Public Service Commission of Wisconsin

¹ Telephone numbers within an area code are a finite quantity. Telephone numbers in the United States are composed of a three-digit area code, a three-digit central office code, and a four-digit line number. This numbering format is specified by the North American Numbering Plan. For example, for the telephone number 414-555-9999, the area code is 414, the central office code is 555, and the line code is 9999. Area codes are more formally called "numbering plan area" codes or NPA codes. Central office codes are referred to as NXX codes. The 414 area code has 792 assignable central office or NXX codes. Up to 10,000 line codes can be assigned in an NXX, although when a central office code reaches 80-90 percent of capacity, a new central office code prefix is implemented.

² As new telecommunications companies enter the market, they request and are assigned central office codes (NXXs) so that they can serve their customers. Under the current assignment guidelines and process, each such assignment uses a full NXX (and its associated line numbers) for every provider in every community that they wish to serve.

³ For example, a customer with a residential line for normal use, a second line for a modem connection to a personal computer, another line for use by the children in the home, and a cellular telephone uses four distinct seven-digit telephone numbers. Of course, other combinations of service are also possible, and lines needed for business purposes would add further demand for numbers.

(Commission) investigated the then-existing 414 area code area. That proceeding resulted in a decision to split the old 414 area code into two parts. The northern and western part of that old area were assigned a new area code – 920. This current investigation is focused on the area that retained the 414 area code. Although the telecommunications industry had forecast that the 414 area code would have a life of several years following the area code split that was completed in 1997, the growth of demand for numbers has been much greater than anticipated.⁴ It is therefore necessary that the issue of a new area code in this area be looked at again.

Lockheed Martin IMS (Lockheed) is the current Area Code Administrator for the 414 area.⁵ When Lockheed recognized the approaching exhaust of available telephone numbers in the 414 area code, it convened a meeting of a telecommunications industry team to examine the viable alternatives and steps to provide for number relief and to achieve the implementation of a new area code. That industry team identified two basic alternatives for changing the 414 area code – an overlay and a geographic split. By a letter dated August 6, 1998, Lockheed wrote, on behalf of the industry team, to advise the Commission that the industry had considered geographic split and overlay alternatives and that “the industry participants reached consensus to recommend an all-services overlay be deployed to provide the needed relief.”

The basic options for area code relief in the 414 area (as in other parts of the country) are, as were identified in the Lockheed letter, an overlay and a geographic split.

With an **overlay**,⁶ the current 414 area code remains the same. All current customers can retain their existing telephone numbers, including the 414 area code. With an overlay, another area code is used within the same geographic area of the 414 code. When all the available numbers (the NXX codes) have been used in the 414 area, new numbers are then assigned using the new area code. This means that customers in the current 414 area, even in the same communities or in the same buildings, can have different area codes. With an overlay, calling between customers with different area codes requires ten-digit dialing. Further, the Federal Communications Commission (FCC) rules for area code assignments specify that with an overlay, **all** calling within the overlay area must use the area code. So, even a call within a community, from one 414-telephone number to another 414-telephone number would need to be dialed using the area code. With an overlay, existing customers need not make number changes or print new written materials (stationery, business cards, billing forms, etc.); however,

⁴ As a result of the 414/920 area code split, approximately 263 NXX codes became available for assignment in the 414 area. By July of 1998, only 122 of these codes remained available. Of the 141 codes that had been assigned since the earlier area code relief was implemented, 47 were assigned to wireless providers, 76 were assigned to competitive local exchange companies and 18 were assigned to incumbent local exchange companies.

⁵ Ameritech was previously the area code administrator; however, due to actions by the Federal Communications Commission, number administration has been contracted to Lockheed Martin IMS. The transition from Ameritech to Lockheed Martin IMS is underway.

⁶ The overlay plan would apply to all services, wire-based and wireless. This is the all-service overlay referenced in the industry team letter. In the past, in other parts of the country, some consideration was given to a wireless-only overlay, where only wireless services (paging, cellular, PCS, etc.) would be assigned the new area code. This type of service-specific or technology-targeted overlay was rejected as anti-competitive by the Federal Communications Commission and is not a viable area code relief alternative. The overlay under consideration here is applicable to all services.

customers may need to reprogram certain equipment (e.g., fax machines, alarms, etc.) to accommodate 10-digit dialing. A map of the current 414 area is attached to this notice; with an overlay, a new area code would be used throughout this area.

An overlay plan for area code relief has no impact on the rates for long distance or local calling.

With a **geographic split**, the current 414 area would be divided in two. In one area, there is no area code change. Customers keep their current telephone numbers and the 414 area code. In the other area, customers keep their current seven-digit telephone numbers, but they must change their area code from 414 to the new code. This requires customers to change their stationery, business cards, billing forms, advertising and other materials that include a telephone number. A geographic split plan will, in some locations, divide counties, towns, villages, or even cities between the two area codes. The same is true for some school districts. Where a geographic split line runs between telephone exchanges that currently have local calling, via extended area service or extended community calling (ECC), the calling rates do not change; however, it becomes necessary to dial additional digits (the area code) for these local calls. The area code must be used on all calls placed between the two area codes; however, with a geographic split, seven-digit dialing remains viable for local calling within the area code. Although the Industry Team does not support a geographic split for this area; it has identified a proposed boundary for the split of the area if one is pursued. The boundary that the industry identified basically follows the Milwaukee County line. The industry proposes that the 414 area code would remain within Milwaukee County. A map showing the industry's proposed demarcation between the two geographic area code areas is attached to this notice. In examining a geographic split alternative for area code relief, the location of the boundary between the area codes is a matter for the Commission to address. Accordingly, the Commission seeks input on the appropriate location of the split line if a geographic split were to be adopted. One of the advantages to the overlay option as noted in the industry filing is that the overlay is expected to provide for a longer life for both the 414 area code and the new code than would be provided by a geographic split. In that regard, if the current 414 area were split into three parts rather than two parts, this would seem to further extend the life of the new area codes. The Commission is interested in input from the industry and consumers as to the feasibility, advisability, and details of a three-way geographic split of the current 414 area.

A geographic split plan for area code relief, like an overlay, has no impact on the rates for long distance or local calls.

The introduction of another area code will impact customers and the providers of telephone service no matter what method is used to deploy that new area code, although the manner in which the new area code is introduced will affect customers differently. The Commission intends to approve an area code relief plan to best meet the needs of the public, to assure that numbers are available when needed, to ease the impact on providers and be competitively fair, and to reflect customer concerns.

NOTICE IS HEREBY GIVEN that pursuant to 47 C.F.R. § 52.19 (1997) and Wis. Stats. §§ 196.02 and 196.37, the Commission will investigate this matter and determine the manner in which another area code will be introduced in the current 414 numbering plan area.

Comments

NOTICE IS FURTHER GIVEN that the Commission will accept comments on this 414 area code issue. Comments should be filed pursuant to the schedule and addressee indicated on page 1 of this notice. Telecommunications industry parties should file the original and 15 copies with the Commission. Members of the general public need only file one copy. Comments may be filed by fax at (608) 266-3957. Fax filing cover sheets must also state “**Official Filing**” and the number of pages (limit 20 pages). File by one mode only.

Comments filed by any means should include the docket number, 05-TI-181. All comments should include the name, address and telephone number of a person substantively familiar with their contents in order to facilitate inquiries.

The Commission is interested in the views of customers, including residential users, businesses and government, as to the benefits or detriments of the two options for providing the new area code. The Commission is also interested in the input of the telecommunications industry on the economic, operational, and competitive implications of the two alternative approaches. Telecommunications industry participants in this proceeding are asked to address the effectiveness of the alternatives in meeting the need for number relief in the 414 area and the schedules and implementation steps needed to effectively make the transition to a new area code under either the overlay or split alternative.

During the proceeding to examine relief in the 414 area code in 1996, and when the 414/920 split became fully effective in 1997, there had been predictions that the resultant 414 area, after the relief implemented at that time, would last for several years. Experience has proven otherwise. The Commission is very concerned about the need to avoid frequent area code changes and is interested in examining number conservation efforts that may be used in the future to avoid early and frequent exhaust of area codes. The Commission recognizes that the FCC has ruled that number conservation is not a replacement for area code relief; however, the FCC has also acknowledged the legitimacy of number conservation for assuring appropriate use of the numbering resource. The Commission is not intending to take any actions that would substitute number conservation for relief efforts aimed at introducing a new area code in the 414 area. The need for a relief plan in 414 is evident and the Commission intends to order number relief (by an overlay or a geographic split) in this proceeding. Interested parties, however, may file comments on the viability of, advisability of, and options for number conservation efforts moving forward for the 414 area code, the new area code, and if appropriate, even for the 920, 608, and 715 area codes.

Parties may also include in their comments any relevant information based on input at the public hearings scheduled below.

Public Hearings

NOTICE IS FURTHER GIVEN that the Commission will conduct public hearings to take input from the general public on views and concerns about the geographic split and overlay methods for providing further area code relief in the 414 area.

Public hearings are scheduled in communities in the current 414 area as follows:

DATE	TIMES	CITY	LOCATION
December 2, 1998	7:00 p.m.	Kenosha	Gateway College Auditorium 3520 – 30th Avenue
December 3, 1998	1:00 and 7:00 p.m.	Milwaukee	Italian Community Center 631 East Chicago Street
December 9, 1998	1:00 p.m.	West Bend	West Bend Inn 2520 West Washington Street
December 9, 1998	7:00 p.m.	Oconomowoc	Olympia Resort 1350 Royale Mile Road
December 10, 1998	1:00 p.m.	Elkhorn	University of Wisconsin – Extension Annex Auditorium W3929 County Road NN
December 10, 1998	7:00 p.m.	West Allis	West Allis Public Library Constitution Room 7421 West National Avenue

These locations are accessible by persons in wheelchairs. Any party with a disability who needs additional accommodations should contact Gary A. Evenson at the number shown below at least one week prior to the scheduled hearing date.

This is a Type III action under Wis. Admin. Code § PSC 4.10(3). Furthermore, since no unusual circumstances have come to the attention of the Commission which indicate that significant environmental consequences are likely, neither an environmental impact statement under Wis. Stat. § 1.11, nor an environmental assessment is required.

Questions on this matter may be addressed to the case coordinator for this proceeding, Gary A. Evenson, Assistant Administrator of the Commission's Telecommunications Division at

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(608) 266-6744 or *evensg@psc.state.wi.us*. Hearing impaired individuals may also use the Commission's TTY number (608) 267-1479.

Dated at Madison, Wisconsin _____

By the Commission:

Lynda L. Dorr
Secretary to the Commission

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Attachment